

1 CLARK COUNTY SCHOOL DISTRICT
2 OFFICE OF THE GENERAL COUNSEL
3 CARLOS L. MCDADE, ESQ.
4 Nevada Bar No. 11205
5 PHOEBE V. REDMOND, ESQ.
6 Nevada Bar No. 9657
7 5100 West Sahara Avenue
8 Las Vegas, Nevada 89146
9 Telephone: (702) 799-5373
10 Email: mcdadcl@nv.ccsd.net
11 Email: redmopv@nv.ccsd.net
12 *Attorneys for Defendant, Clark County School District*

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

12 O.R., by and through her Parents, Sig and Lori
13 Rogich and Sig and Lori Rogich, Individually,

14 Plaintiffs,

15 v.

16 CLARK COUNTY SCHOOL DISTRICT,

17 Defendant.
18

CASE NO.: 2:17-cv-01541-RFB-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT ON
COUNTS II AND III OF THE
COMPLAINT**
(First Request)

19 COMES NOW, Plaintiff and Defendant Clark County School District ("District"), by and
20 through their attorneys of record, and hereby stipulate and agree that the District may have up to
21 and including February 26, 2018, to respond to PLAINTIFFS' MOTION FOR SUMMARY
22 JUDGMENT ON COUNTS II AND III OF THE COMPLAINT (hereinafter referred to as "the
23 Motion") in this matter. The Motion was served on January 22, 2018; therefore, the current
24 response date is February 12, 2018. This is the first request for an extension to the response due
25 date.
26
27
28

1 This request is being entered for good cause, in good faith, and not for reason of delay.
2 Although District's counsel has been actively working on a response to the Motion, she has been
3 called out of state to address the severe medical needs of an elderly parent.

4 THEREFORE, the parties respectfully request the response due date be extended fourteen
5 (14) days up to and including February 26, 2018.

6 DATED this 9th day of February, 2018.

7
8 CLARK COUNTY SCHOOL DISTRICT
9 OFFICE OF THE GENERAL COUNSEL

FREEMAN LAW OFFICES, LLC

10 By: /s/ Phoebe V. Redmond
11 PHOEBE V. REDMOND, ESQ.
12 Nevada Bar No. 9657
13 5100 West Sahara Avenue
14 Las Vegas, Nevada 89146
15 *Attorneys for Defendant, CCSD*

By: /s/ Hillary D. Freeman
HILLARY D. FREEMAN, ESQ.
N.J. Attorney I.D. No. 002362006
(Admitted *Pro Hac Vice*)
103 Carnegie Center, Suite 101
Princeton, New Jersey 08540
Attorneys for Plaintiffs

16
17 IT IS SO ORDERED.

18 

19 RICHARD F. BOULWARE, II
20 United States District Judge

21 DATED this 13th day of February, 2018.
22
23
24
25
26
27
28